

Brent J. Gilhousen  
Assistant General Counsel – Environmental  
Direct Dial: 314-674-8504  
Facsimile: 314-674-5588  
bjgilth@Solutia.com

August 30, 2001

VIA CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Ms. Carlyn Winter Prisk (3HS11)  
U.S. Environmental Protection Agency, Region III  
1650 Arch Street  
Philadelphia, PA 19103-2029

Re: Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill,  
And Folcroft Landfill Annex; Solutia Inc.'s Response to EPA's § 104(e)  
Information Request

Dear Ms. Winter Prisk:

This transmittal letter and attached 104(e) response timely responds to a U.S. Environmental Protection Agency ("EPA") fifteen day request for information, addressed to "Monsanto Company c/o Solutia Inc." (hereinafter "Solutia") concerning the Lower Darby Creek Area Superfund Site – Clearview Landfill, Folcroft Landfill, and Folcroft Landfill Annex located in Delaware and Philadelphia Counties, Pennsylvania (hereinafter the "Site"). Solutia received the request on August 15, 2001.

Effective September 1, 1997, Monsanto Company ("Monsanto"), now known as Pharmacia Corporation ("Pharmacia"), spun off certain of its chemical businesses into a separate company, Solutia Inc. Solutia is a publicly held corporation incorporated in Delaware. Under the separation agreement between the two parties, Solutia agreed to indemnify Pharmacia for certain liabilities related to its chemical businesses.

In response to EPA's information request, Solutia disagrees with EPA's overly broad assumption of authority, which EPA asserts is conferred by the Comprehensive Environmental Response, Compensation & Liability Act ("CERCLA"), 42 U.S.C. § 9601 *et seq.*, and other laws. Solutia also objects to the overly broad scope of the questions and definitions included within EPA's information request.

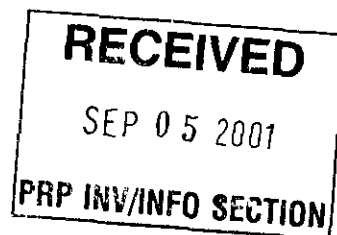
**Solutia Inc.**

575 Maryville Centre Drive  
St. Louis, Missouri 63141

P.O. Box 66760

St. Louis, Missouri 63166-6760

Tel 314-674-1000



However, Solutia is responding to EPA's request in accordance with Solutia's policy of cooperating with legitimate investigations by government agencies. Therefore, Solutia is voluntarily responding to your request, but at the same time not waiving any objections to EPA's statement of authority or the scope of information requested.

On May 28 and July 1, 1987, Pharmacia (formerly Monsanto Company) responded to a Section 104(e) Request from the EPA regarding the Tinicum Marsh/Folcroft Landfill, Folcroft, Pennsylvania. At that time, Pharmacia did a thorough review of all operating facilities and corporate records and found no information which indicated that any materials generated by Pharmacia were disposed of at the Tinicum Marsh/Folcroft Landfill site (see Attachments A & B).

Solutia is again undertaking a comprehensive, good faith search for information regarding the potential connection to the Site at issue. A diligent inquiry, since the physical breakup of the two companies is ongoing. A supplemental reply will be forthcoming when that inquiry is complete.

To aid in our review, and particularly in light of the complete absence of information in its records indicating any relationship to the Site, Solutia hereby requests, pursuant to the Freedom of Information Act, that EPA provide Solutia with copies of any documents or a description of any other information in EPA's possession which has led EPA to include Solutia as a recipient of the Section 104(e) Request for the Site. At the present time, however, the only information available to Solutia indicates that it is not responsible for any materials or wastes, including those that might contain hazardous substances, located at the Site.

Please forward all future communications regarding this site to the undersigned.

If you have any questions regarding this matter, please contact me directly at the telephone number shown above.

Sincerely,



Brent J. Gilhousen  
Assistant General Counsel  
Environmental

Enclosures

ORIGINAL  
(Red)

RESPONSE TO REQUEST FOR INFORMATION:  
LOWER DARBY CREEK AREA SUPERFUND SITE – CLEARVIEW LANDFILL,  
FOLCROFT LANDFILL, AND FOLCROFT LANDFILL ANNEX

ORIGINAL  
(Red)

On May 28 and July 1, 1987, Pharmacia (formerly Monsanto Company) responded to a Section 104(e) Request from the EPA regarding the Tinicum Marsh/Folcroft Landfill, Folcroft, Pennsylvania. At that time, Pharmacia did a thorough review of all operating facilities and corporate records and found no information which indicated that any materials generated by Pharmacia were disposed of at the Tinicum Marsh/Folcroft Landfill site (Attachments A & B). Solutia is again undertaking a comprehensive, good faith search for information regarding the potential connection to the Site at issue. A diligent inquiry, since the physical breakup of the two companies is ongoing. To date, Solutia has been unable to locate evidence that indicates Pharmacia sent any material to the Site.

As explained in the letter accompanying this response, Monsanto Company ("Monsanto"), now known as Pharmacia Corporation ("Pharmacia"), spun-off its chemical businesses into a separate and publicly held corporation named Solutia Inc. ("Solutia"), which came into existence on or about September 1, 1997. At that time, Solutia agreed to undertake certain representations relative to businesses that became assets of Solutia. Among those obligation is to respond to inquiries such as information request received by EPA pursuant to 42 U.S.C. § 9604(e).

Solutia generally objects to the overly broad and unduly burdensome nature of the questions included in the August 8, 2001, request for information propounded by the U.S. Environmental Protection Agency ("EPA"), which was received by Solutia on August 15, 2001. Solutia also objects to the instructions and definitions included in the request for information as exceeding the scope of EPA's authority for purposes of a hazardous waste disposal site information request. Finally, Solutia objects that EPA's information request contains undefined or improperly-defined terms, rendering the questions vague and ambiguous, overly broad and unduly burdensome. These objections are continuing in nature, and apply to each and every response to EPA's information request. Notwithstanding these objections, Solutia provides the responses as set forth below.

RESPONSES TO QUESTIONS

**1. State the name of your company, its mailing address, and telephone number.**

Response: The correct legal name of this Company responding to this 104(e) request is:

Solutia Inc.

6/10/97  
(Reg)

**Further identify:**

**a. The dates and states of incorporation of your company;**

Response: Solutia was incorporated in the state of Delaware on April 1, 1997.

**b. The date and original state of incorporation of your company; and**

Response: Solutia was incorporated in the state of Delaware on April 1, 1997.

**c. The parent corporation of your company, if any, and all subsidiaries or other affiliated entities.**

Response: Solutia is not a subsidiary or affiliate of any other entity. There currently exists a multitude of subsidiaries and affiliates of the parent corporation, Solutia Inc., organized and operated throughout the world. Information and data on each individual subsidiary is far beyond the appropriate scope of inquiry in connection with the Site and to the extent such information is requested, Solutia hereby objects to said request.

We have conducted a careful and thorough investigation of available records to identify those entities within Solutia that may have had dealings with the Site.

**2. What is the current nature of the business or activity conducted at your establishment(s) in the Philadelphia, Pennsylvania area? What was the nature of Monsanto's business or activity between 1958 and 1976? Please describe in detail. If the nature of your business or activity changed from the period of 1958 to 1976 to the present, please provide a detailed explanation of the changes to date.**

Response: The current nature of Solutia's business is primarily manufacturing, refining, and processing a variety of industrial, commercial and consumer chemical products. Solutia did not exist during the referenced time period from 1958 to 1976, however, Pharmacia's business activity between 1958 and 1976 was primarily manufacturing, refining and processing a variety of industrial, commercial and consumer chemical products. The nature of the business has not changed since 1958, although some operating facilities in the Philadelphia, Pennsylvania area were sold or closed over that time period.

**3. Identify all persons currently or formerly employed by Solutia or Monsanto who have or may have personal knowledge of your operations and waste disposal practices between 1958 and 1976 at your facilities in the Philadelphia, Pennsylvania area. For each such person, state that person's employer, job title, dates of employment, current address, and telephone number. If the current telephone number or address is not available, provide the last known telephone number or last known address of such person.**

Response: To be supplemented.

4. **Identify the owners and operators of your establishment(s) in the Philadelphia, Pennsylvania area from 1958 to the present. For each owner and operator further provide.**

**a. The dates of their operation;**

Response: Pharmacia owned and operated numerous facilities in the northeast region of the United States. Therefore, we have limited our review to facilities that operated from 1958 to the present within a 100 mile radius of the Site.

Camden Plant  
1500 Pine Street  
Camden, NJ 08103

Purchased by Pharmacia in 1935 from Swann Corporation. Pharmacia sold facility to Camdett Corporation on April 1, 1993.

Kearny Plant  
Pennsylvania Avenue  
Kearny, NJ 07032

Pharmacia began operation in September 1955. Facility was shut-down in 1991.

Kenilworth Plant  
N. 8<sup>th</sup> Street & Monroe Avenue  
Kenilworth, NJ 07033

Pharmacia began operation in 1939. Sold to INNOPAK Corporation in September 1987.

Yardville Plant  
584 Route 130  
Trenton, NJ 08691

Pharmacia purchased this facility in July of 1961 from Plax Corporation. Sold to Polychrome in February 1982.

Delaware River Plant  
U.S. Route 130  
Bridgeport, NJ 08014

Construction completed on facility in late 1961. Solutia sold to Ferro Corporation on August 21, 2000. Solutia retained ownership of certain units at Delaware River but it is operated by Ferro Corporation. That process is used to manufacture Tetrathal flame retardant.

**b. The nature of their operation; and**

Response:

Camden Plant: Produced natural and synthetic bone ash, lampblack, and Phos-Chek.

Kearny Plant: Produced phosphoric acid, sodium and potassium phosphates and surfactants.

Kenilworth Plant: Produced polyethylene film and sheet, and polyethylene bottles.

Yardville Plant: Produced blow-molded plastic containers.

Delaware River Plant: Produces organic phosphorus compounds, phthalic anhydride, benzyl chloride, plasticizers, muriatic acid, tetrachlorophthalic anhydride and solvents.

- c. All information or documents relating to the handling and/or generation, storage, treatment, recycling, formulation, disposal, or transportation of any hazardous substance, hazardous waste, pollutant, contaminant, or other waste during the period in which they were operating the establishment(s).**

Response: To be supplemented.

- 5. Describe the types of documents generated or maintained by your establishment(s) in the Philadelphia, Pennsylvania area concerning the handling and/or generation, storage, treatment, transportation, recycling, formulation, or disposal of any hazardous substance, hazardous waste, pollutant, contaminant or other waste between 1958 and 1976.**
- a. Provide a description of the information included in each type of document and identify the person who was/is the custodian of the documents;**
  - b. Describe any permits or permit applications and any correspondence between your company and/or establishment(s), and any regulatory agencies regarding the transportation and disposal of such wastes; and**
  - c. Describe any contracts or correspondence between your company and/or establishment(s) and any other company or entity regarding the transportation and disposal of such wastes.**

Response: To be supplemented.

6. **Identify every hazardous substance used, generated, purchased, stored, or otherwise handled at your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. Provide chemical analyses and Material Safety Data Sheets ("MSDS"). With respect to each such hazardous substance, further identify:**
- a. **The process(es) in which each hazardous substance was used, generated, purchased, stored, or otherwise handled;**
  - b. **The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such hazardous substance;**
  - c. **The annual quantity of each such hazardous substance used, generated, purchased, stored, or otherwise handled;**
  - d. **The beginning and ending dates of the period(s) during which such hazardous substance was used, generated, purchased, stored, or otherwise handled;**
  - e. **The types and sizes of containers in which these substances were transported and stored; and**
  - f. **The persons or companies that supplied each such hazardous substance to your company.**

Response: Solutia is not able to respond within the fifteen day time frame to the questions related to every hazardous substance in that question and its six subparts. As information and MSDS's are identified, they will be timely submitted to EPA.

7. **Identify all by-products and wastes generated, stored, transported, treated, disposed of, released, or otherwise handled by your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976. With respect to each such by-product and waste identified, further provide:**
- a. **The process(es) in which each such by-product and waste was generated, stored, transported, treated, disposed of, released, or otherwise handled;**
  - b. **The chemical composition, characteristics, and physical state (solid, liquid, or gas) of each such by-product or waste;**
  - c. **The annual quantities of each such by-product and waste generated, stored, transported, treated, disposed of, released, or otherwise handled;**

- d. **The types, sizes, and numbers of containers used to treat, store, or dispose of each such by-product or waste;**
- e. **The name of the individual(s) and/or company(ies) that disposed of or treated each such by-product or waste; and**
- f. **The location and method of treatment and/or disposal of each such by-product or waste.**

Response: To be supplemented.

8. **Did your company ever contract with, or make arrangements with Clearview, Folcroft, Folcroft Annex, Eastern Industrial, Tri-County Hauling, S. Buckly Trash Hauling, Barratt Rupert, McCloskey Engineering, Marvin Jonas, Jonas Waster (sic) Removal, Schiavo Bros., Inc., ADM Disposal Services and/or any other company or municipality to remove or transport material from your establishment(s) in the Philadelphia, Pennsylvania area between 1958 and 1976 for disposal? If so, for each transaction identified above, please identify:**

- a. **The person with whom you made such a contract or arrangement;**

Response: Records indicate that Marvin Jonas removed material from the Delaware River Plant. Our records do not reflect a contract or who made arrangements for the removal of material with Marvin Jonas.

- b. **The date(s) on which or time period during which such material was removed or transported for disposal;**

Response: Marvin Jonas removed material from the Delaware River Plant during the time period of 1974 to early 1978.

- c. **The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);**

Response: The material removed by Marvin Jonas at the Delaware River Plant was phthalic anhydride "heads" from a distillation process contained in drums. These "heads" consisted primarily of phthalic anhydride and acid with smaller amounts of benzoic acid and maleic anhydride. Once this material was placed in a drum it hardened like concrete, and could not be removed from the drum.

- d. **The annual quantity (number of loads, gallons, drums) of such material;**

Response: The years during which Marvin Jonas removed this material from the Delaware River Plant and the approximate volumes of the shipments are as follows:



Bicy

<u>Date</u>	<u>Quantity</u>
1973	241 drums/13,255 gal./139,000 lbs.
1974	218 drums/12,600 gal./109,000 lbs.
1975	150 drums/9,460 gal./82,000 lbs.
1976	141 drums/8,910 gal./77,000 lbs.
1977	257 drums/15,897 gal./137,800 lbs.
1978	88 drums/5,104 gal./50,380 lbs.
1979	No evidence of use of Jonas for disposal.
1980	No evidence of use of Jonas for disposal; Purchase of 15 new steel drums from Jonas Steel Drum Company by the Delaware River Plant.
<u>Total:</u>	1095 drums/65,226 gal./595,180 lbs.

**e. The manner in which such material was containerized for shipment or disposal;**

Response: The material was placed in drums.

**f. The location to which such material was transported for disposal;**

Response: Records indicate that this material was transported by Marvin Jonas and disposed of at landfills other than the Site.

**g. The person(s) who selected the location to which such material was transported for disposal;**

Response: Records do not indicate who selected the location to which such material was transported for disposal.

**h. The individuals employed with any transporter identified (including truck drivers, dispatchers, managers, etc.) with whom your establishment dealt concerning removal or transportation of such material; and**

Response: Records indicate that the following people were former truck drivers for Marvin Jonas:

William Louis Abington  
Clarence Jefferson  
David Bumbaugh

- i. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your possession regarding arrangements made to remove or transport such material**

Response: Attachment C is a copy of Marvin Jonas' 1973 through 1978 account receivable ledgers on Monsanto Chemical Company.

- 9. Provide the names, titles, areas of responsibility, addresses, and telephone numbers of all persons who, between 1958 and 1976, may have:**

- a. Disposed of or treated materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site:**
- b. Arranged for the disposal or treatment of materials at Clearview, Folcroft and Folcroft Annex or other areas of the Site; and/or**
- c. Arranged for the transportation of materials to Clearview, Folcroft and Folcroft Annex or other areas of the Site (either directly or through transshipment points) for disposal or treatment.**

Response: Solutia has no information responsive to question 9 and all of its subparts.

- 10. For every instance in which your establishment(s) disposed of or treated material at Clearview, Folcroft and Folcroft Annex or other areas of the Site, or arranged for the disposal or treatment of material at the Site, Identify:**

- a. The date(s) on which such material was disposed of or treated at the Site:**
- b. The nature of such material, including the chemical content, characteristics, and physical state (i.e., liquid, solid, or gas);**
- c. The annual quantity (number of loads, gallons, drums) of such material;**
- d. The specific location on the Site where such material was disposed of or treated; and**
- e. Any billing information and documents (invoices, trip tickets, manifests, etc.) in your company's or establishment's(s') possession regarding arrangements made to dispose of or treat such material at the Site.**

Response: Solutia has no information responsive to question 10 and all of its subparts.

- 11. Did your establishment(s), or any other company or individual ever spill or cause a release of any chemicals, hazardous substances, and/or hazardous waste, and/or non-hazardous solid waste on any portion of Clearview, Folcroft and Folcroft Annex or any other portion of the Site? If so, identify the following:**
- a. The date(s) of the spill(s)/release(s) occurred;**
  - b. The composition (i.e., chemical analysis) of the materials which were spilled/released;**
  - c. The response made by you or on your behalf with respect to the spill(s)/release(s); and**
  - d. The packaging, transportation, and final disposition of the materials which were spilled, released.**

Response: Solutia has no information responsive to question 11 and all of its subparts.

- 12. Please identify individuals employed by your establishment(s) who were responsible for arranging for the removal and disposal of wastes, and individuals who were responsible for payments, payment approvals, and record keeping concerning such waste removal transactions at your Philadelphia, Pennsylvania area establishment(s) between 1958 and 1976. Provide current or last known addresses and telephone numbers where they may be reached. If these individuals are the same persons identified by your answer to questions 3, so indicate.**

Response: To be supplemented.

- 13. Did you or any person or entity on your behalf ever conduct any environmental assessments or investigations relating to contamination at Clearview, Folcroft and Folcroft Annex or any other areas of the Site? If so, please provide all documents pertaining to such assessments or investigations.**

Response: Solutia has no knowledge of responsive information.

- 14. If you have any information about other parties who may have information which may assist the EPA in its investigation of the Site, including Clearview, Folcroft and Folcroft Annex, or who may be responsible for the generation of, transportation to, or release of contamination at the Site, please provide such information. The information you provide in response to this request should include the party's name, address, telephone number, type of business, and the reasons why you believe the party may have contributed to the contamination at the Site or may have information regarding the Site.**

Response: To be supplemented.

**15. Representative of your establishment(s):**

- a. Identify the person(s) answering these questions on behalf of your establishment(s) including full name, mailing address, business telephone number, and relationship to the company.**

Response:

Brent J. Gilhousen (3S)  
Solutia Inc.  
Assistant General Counsel – Environmental  
575 Maryville Centre Drive  
St. Louis, MO 63141  
(314) 674-8504

Sharon J. Williams (3S)  
Solutia Inc.  
Legal Assistant – Environmental  
575 Maryville Centre Drive  
St. Louis, MO 63141  
(314) 674-5072

Shirley J. Schomburg (3S)  
Solutia Inc.  
Administrative Assistant – Environmental  
575 Maryville Centre Drive  
St. Louis, MO 63141  
(314) 674-8505

- b. Provide the name, title, current address, and telephone number of the individual representing your establishment(s) to whom future correspondence or telephone calls should be directed.**

Response:

Brent J. Gilhousen (3S)  
Solutia Inc.  
Assistant General Counsel – Environmental  
575 Maryville Centre Drive  
St. Louis, MO 63141  
(314) 674-8504

16. If any of the documents solicited in this information request are no longer available, please indicate the reason why they are no longer available. If the records were destroyed, provide us with the following:

- a. Your document retention policy;
- b. A description of how the records were/are destroyed (burned, archived, trashed, etc.) and the approximate date of destruction;
- c. A description of the type of information that would have been contained in the documents; and
- d. The name, job title, and most current address known to you of the person(s) who would have produced these documents, the person(s) who would have been responsible for the retention of these documents; and the person(s) who would have been responsible for the destruction of these documents.

Response: To be supplemented.

# Monsanto

LAW DEPARTMENT

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 894-1000

May 28, 1987

VIA AIRBORNE

Lois A. Lauria  
Environmental Protection Assistant  
U.S. Environmental Protection Agency  
Region III  
CERCLA Removal Enforcement Section (3HW14)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

Re: Tinicum Marsh/Folcroft Landfill, Folcroft, Pennsylvania

Dear Ms. Lauria:

As discussed during our telephone conversation of May 27, 1987 concerning the site referenced above, we are making a preliminary response to the U.S. Environmental Protection Agency's (U.S. EPA) letter dated May 8, 1987 even though we have not yet had an adequate opportunity to fully review our records in this matter. We must first note that we disagree with the U.S. EPA's overly broad assumption of authority which it asserts is conferred by the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), 42 U.S.C. Section 6901, et. seq., and the Resource Conservation and Recovery Act (RCRA). We also object to the overly broad scope of the questions included in the U.S. EPA's information request. However, consistent with Monsanto's policy of cooperation with government agencies, we are responding to your request, but at the same time not waiving any objections to U.S. EPA's statement of authority or the scope of information requested.

Based upon our review to date, we can provide the following responses to the information requests contained in U.S. EPA's May 8, 1987 letter. We anticipate that we will be able to supplement this response by July 1, 1987 with any additional

information derived from our further reviews. As for the nature of this company's business, Monsanto primarily manufactures, refines and processes a variety of industrial, commercial and consumer chemical products. We have no information of having sent any type or quantity of hazardous substances to the Folcroft Landfill and Landfill Annex. As a result, questions concerning dates of shipment, physical states, manner of disposal, and correspondence with regulatory agencies or third parties, are not applicable. Furthermore, we have no information on the identity of any other person who may have been involved with hazardous substances at the Folcroft Landfill and Landfill Annex. Similarly, we have no documents relating to any real interests in these sites. Finally, we have no correspondence between ourselves and any regulatory agency or third party regarding the Folcroft Landfill or Folcroft Annex.

As for any insurance against releases of hazardous wastes or substances, Monsanto Company had, and does have, various insurance policies with coverages which vary over the past thirty years. If Monsanto is ever adjudged liable for costs arising from disposal of waste materials, Monsanto and its insurance carriers will determine whether or not certain policies provide coverage for the specific occurrences which led to the liability.

While Monsanto is presently continuing to search its records for further information on the sites, it is noted that the U.S. EPA's information request on these sites is extremely broad and apparently relates to a period of time some 15 to 25 years ago (1960-1973). Given the age of the transactions and the scope of the information in which EPA is interested, Monsanto cannot fully respond to the U.S. EPA's request without the corresponding assistance of the U.S. EPA. Accordingly, we request that U.S. EPA provide us with all data in its possession which reflects any involvement of Monsanto with the sites referenced above. Unless U.S. EPA can shed some light upon the alleged involvement, the accuracy of our response to the U.S. EPA's information request will suffer.

In general, please be assured that Monsanto supports the prompt, efficient cleanup of sites which present an imminent and substantial danger to human health, welfare and the environment. In the event there is evidence that Monsanto is responsible for hazardous substances at the site referenced above, Monsanto is prepared to participate with other potentially responsible parties in cleanup efforts, based upon an appropriate apportionment of responsibility among all the parties. Accordingly, consistent with our request for information above, please provide Monsanto with any information which leads the U.S. EPA to believe that Monsanto is liable for cleanup costs at these sites.

If you have any questions concerning information supplied by Monsanto herein, or our request for information from U.S. EPA, please call me at 314/694-1278.

Very truly yours,

A handwritten signature in cursive script, reading "Stephen Krchma".

Stephen P. Krchma  
Environmental Attorney

ehEL213/17



# Monsanto

LAW DEPARTMENT

Monsanto Company  
800 N. Lindbergh Boulevard  
St. Louis, Missouri 63167  
Phone: (314) 694-1000

July 1, 1987

Lois A. Lauria  
Environmental Protection Assistant  
U.S. Environmental Protection Agency  
Region III  
CERCLA Removal Enforcement Section (3HW14)  
841 Chestnut Building, 6th Floor  
Philadelphia, PA 19107

Re: Tinicum Marsh/Folcroft Landfill, Folcroft, Pennsylvania

Dear Ms. Lauria:

In our previous letter, dated May 28, 1987, on this subject, we advised you that we would complete the review of our records on this matter by July 1, 1987 and advise you of any additional information derived from that review. We have now completed our review and have found no additional information which indicates that any materials generated by Monsanto were disposed of at the Tinicum Marsh/Folcroft Landfill site.

As indicated in our earlier correspondence, the time period and scope of information sought is such that Monsanto's response to the U.S. EPA's information request requires the corresponding assistance of the U.S. EPA. We therefore requested that the U.S. EPA provide us with all data which reflects any involvement of Monsanto with the Tinicum Marsh/Folcroft Landfill site. We have not yet received a response to this request.

Once we have had an opportunity to review any information which the U.S. EPA has concerning Monsanto's alleged involvement, we may be in a position to further supplement our response. In the meanwhile, if you have any questions concerning Monsanto's position in this matter, please call me.

Very truly yours,



Stephen P. Krchma  
Environmental Attorney

ehEL214/12

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

NAME  
ADDRESS  
CITYMONSANTO CHEMICAL CO.  
Rt. #130  
Bridgeport, N.J. 08014

WASTE

BALANCE FORWARD →

DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
5-29	A140	3191	351 -		351 -	
6-29	R122	3191		351 -	- -	351 -
11-12	A <sup>30</sup> 29	4651	342 -		342 -	
12/19	R35	4651		342 -	- -	342 -
4/12	A17	4043	371 50		371 50	
4/24	R18	4043		371 50	- -	371 50
6/17	A29	5767	575 -		575 -	
8-29	A40	5474	468 -		1043 -	575 -
9-23	R37	5167		575 -	468 -	1043 -
9-23	R37	5474		468 -	- -	468 -
11/15	A1	5915	585 -		585 -	
1-24	R3	5915		585 -	- -	585 -
6-11	A25	6549	585 -		585 -	
7/17	R26	6549		585 -	- -	585 -
11/15	A45	7144	533 00		533 00	
12/5	R40	7144		533 00	- -	533 00
6/7/76	S-74	7951	520 00		520 00	- 0 -
6/25	R64	7951		520 00	- 0 -	520 00
8/31	S-86	8311	520 00		520 00	- 0 -
9/17	R-73	8311		520 00	- 0 -	520 00
			1977			
1/12/77	S-4	131	663 00		663 00	- 0 -
2/1/77	R3	131		663 00	- 0 -	663 00
6/27	S32	900	748 00		748 00	- 0 -
7/22	R.23	900		748 00	- 0 -	748 00

SAFEGUARD BUSINESS SYSTEMS  
LANSDALE PA LOS ANGELES CHICAGO ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-7

PRINTED  
U.S.A.

ATTACHMENT C

1 2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25 26 27 28 29 30 31

NAME **Monsanto Chem. Co.**  
 ADDRESS  
 CITY

WASTE

1978				BALANCE FORWARD →		- 0 -	
DATE	FOLIO	DETAIL	✓	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1 1/1	51	1819	✓	880 00		880 00	- 0 -
2 1/27	P.3	1819	✓		880 00	- 0 -	880 00
3 4/17	S-18	2279	✓	1584 00		1584 00	- 0 -
4 5/18	P.16	2279	✓		1584 00	- 0 -	1584 00
5 11/6	S-11	8403	✓	396 00	TRANSF	396 00	- 0 -
6 11/30	P.44	8403	✓		396 00	396 00	- 0 -
7						- 0 -	
8							
9				1979			
10				1980			
11				1981			
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SAFEGUARD BUSINESS SYSTEMS  
 LANSDALE, PA. LOS ANGELES, CHICAGO, ATLANTA

ACCOUNTS RECEIVABLE LEDGER

FORM NO. ARL-7

PRINTED  
 U.S.A.

# Monsanto B-report

Date	Crops	Fertilizer	Yield	Moisture	Grain	Straw	Total	Remarks
8/31	80 dr	4,000	16.1	21.71	16.1	21.71	16.1	Huckerbocker, Maine
300	8,000 gals	21.71	16.1	21.71	16.1	21.71	16.1	Huckerbocker, Maine
11/7/77	78 dr	3,900	15.6	21.71	15.6	21.71	15.6	Huckerbocker, Maine
6/27	82 dr	4,400	17.6	21.71	17.6	21.71	17.6	Huckerbocker, Maine
9/12	91 dr	4,550	19.	21.71	19.	21.71	19.	Huckerbocker, Maine
12/20	85 dr	4,400		21.71		21.71		Huckerbocker, Maine
17-250	gals.	21-711	Solids					Huckerbocker

Bridgeport  
N.J.

Monsanto Chem.

Date	Cont.	Gallons	Material	Disposal Site
4/17	88 dr	4400	<sup>21 31</sup> 4400	grown ✓ S.R.O.W.S. - solid - 4400
5/22	256L	Mob L 5.24/y	OIL <sup>21 31</sup> solids ✓	# Kriekenboeken Kriekenboeken - solid - 21-71 50-

NAME  
ADDRESS  
CITY

Thos "M"

BALANCE FORWARD →

3931 00

	DATE	FOLIO	DETAIL	DEBIT	CREDIT	BALANCE	PREVIOUS BALANCE
1	9/9	R.30	1067-69 <sup>matl</sup>		1262 00	2672 00	2672 00
2	9/12	S.47	1268 <sup>matl</sup>	800 00		3472 00	2672 00
3	9/12	S.47	1269 <sup>matl</sup>	910 00		4382 00	2672 00
4	9/19	S.48	1321 <sup>matl</sup>	630 00		5012 00	2672 00
5	9/23	R.31	1130 <sup>matl</sup>		850 00	4162 00	2672 00
6	9/30	R.32	1269 <sup>matl</sup>		910 00	3252 00	2672 00
7	9/30	S.52	1402 <sup>matl</sup>	850 00		4102 00	2672 00
8	10/14	R.34	1187		932 00	3170 00	2672 00
9	10/21	R.34	1129		890 00	2280 00	2672 00
10	10/24	S.54	1492 <sup>matl</sup>	934 00		3214 00	2672 00
11	10/28	R.35	1268 <sup>matl</sup>		800 00	2414 00	2672 00
12	11/31	S.56	1524 <sup>matl</sup>	2096 00		4510 00	2672 00
13	11/4	R.36	1321		630 00	3880 00	2672 00
14	11/7	S.58	1568 <sup>matl</sup>	1864 00		5744 00	2672 00
15	11/10	R.37	1402		850 00	4894 00	2672 00
16	11/29	S.61	1652	300 00		5194 00	2672 00
17	12/2	R.40	1492		934 00	4260 00	2672 00
18	11/30	S.61	1672	600 00		4860 00	2672 00
19	12/9	R.41	1524		2096 00	2764 00	2672 00
20	12/12	R.41	1568		1864 00	900 00	2672 00
21	12/12	S.63	1735	300 00		1200 00	900 00
22	12/12	S.63	1714	600 00		1800 00	1200 00
23	12/19	S.64	1757	300 00		2100 00	1800 00
24	12/19	S.64	1758	600 00		2700 00	2100 00
25	12/27	S.65	1784	982 00		3682 00	2700 00

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